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5 VEM MILLER
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 VEM MILLER,

11 Plaintiff,

12 vs.

13 CHAD BIANCO, in his individual and
14 official capacities; COUNTY OF
RIVERSIDE, a municipal entity;
15 RIVERSIDE COUNTY SHERIFF'S
DEPARTMENT; DAVID
16 CORONADO; and DOES 1 through 100,

17 Defendants.
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CASE NO.: 5:25-cv-00629-KK (DTBx)

**DECLARATION OF ETHAN
BEARMAN IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' NOTICE OF
MOTION AND MOTION TO
DISMISS AND SPECIAL MOTION
TO STRIKE PLAINTIFF'S FIRST
AMENDED COMPLAINT**

DECLARATION OF ETHAN BEARMAN IN SUPPORT OF PLAINTIFF'S OPPOSITION TO
DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS AND SPECIAL MOTION
TO STRIKE PLAINTIFF'S FIRST AMENDED COMPLAINT

DECLARATION OF ETHAN BEARMAN

I, Ethan Bearman, do hereby declare and state as follows:

1. I am lead counsel of record for Plaintiff Vem Miller in the above action. I submit this declaration in support of his Opposition to Defendant's Notice of Motion and Motion to Dismiss and Special Motion to Strike Plaintiff's First Amended Complaint. I have personal knowledge of the matters stated below. If called as a witness, I could and would testify competently thereto.
2. I am in possession of what appears to be official departmental policy documentation, obtained through confidential sources whose identity I cannot disclose without compromising ongoing litigation strategy. Attached hereto as **Exhibit 4** is a true and correct copy of Riverside County Sheriff's Department Policy 347 from Riverside County Sheriff's Department Standards Manual (DSM) dated June 16, 2020.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

EXECUTED on July 3, 2025, in Beverly Hills, California.

By: /s/ Ethan Bearman

Ethan Bearman

EXHIBIT 4

Report Preparation

347.1 PURPOSE AND SCOPE

Report preparation is a major part of each deputy's job. The purpose of reports is to document sufficient information to refresh the deputy's memory and to provide sufficient information for follow-up investigation and successful prosecution. Report writing is the subject of substantial formalized training and on-the-job training.

<http://intranet.riversidesheriff.org/ReportWriting/ReportWritingManual.pdf>

347.1.1 REPORT PREPARATION

Employees should ensure that reports are sufficiently detailed for their purpose and free from errors prior to submission. It is the responsibility of the assigned employee to complete and submit all reports taken during the shift before going off-duty unless permission to hold the report has been approved by a supervisor. Generally, reports requiring prompt follow-up action on active leads, or arrest reports where the suspect remains in custody should not be held.

Handwritten reports must be prepared legibly. If the report is not legible, the submitting employee will be required by the reviewing supervisor to promptly make corrections and resubmit the report. Employees who dictate reports shall use appropriate grammar, as content is not the responsibility of the typist. Employees who generate reports on computers are subject to all requirements of this policy.

All reports shall accurately reflect the identity of the persons involved, all pertinent information seen, heard or assimilated by any other sense, and any actions taken. Employees shall not suppress, conceal or distort the facts of any reported incident, nor shall any employee make a false report orally or in writing. Generally, the reporting employee's opinions should not be included in reports unless specifically identified as such.

347.2 REQUIRED REPORTING

Written reports are required in all of the following situations on the appropriate department approved forms.

347.2.0 MANDATORY REPORTING OF JUVENILE GUNSHOT INJURIES

A report shall be taken when any incident in which a child 18 years or younger suffered an unintentional or self-inflicted gunshot wound. The department shall notify the California Department of Public Health (CDPH) of the incident as required by CDPH (Penal Code § 23685).

347.2.1 DOCUMENTING CRIMINAL AND NON-CRIMINAL ACTIVITY

When a member responds to a call for service, or as a result of self-initiated activity becomes aware of any activity where a crime has occurred, the member shall document the incident regardless of whether a victim desires prosecution. When willing, reporting parties reporting a crime or other incident that occurred in an unincorporated area may be referred to the online reporting system when no suspect or follow-up information is available.